

MICHELLE A. CHILDERS (SBN #197064)
michelle.childers@dbr.com
NATHAN D. CARDOZO (SBN #259097)
nathan.cardozo@dbr.com
DRINKER BIDDLE & REATH LLP
50 Fremont Street, 20th Floor
San Francisco, CA 94105-2235
Telephone: (415) 591-7500
Facsimile: (415) 591-7510

Attorneys for Defendants
ETHICON, INC. (on its own behalf and behalf of its
Division, ETHICON WOMEN'S HEALTH &
UROLOGY, and erroneously sued as GYNECARE,
INC.); and JOHNSON & JOHNSON

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LYNNETTE BLACKMAN, an individual,
PAMELA AGUILAR, an individual,
BETTY GIPE, an individual, EDITH
ROBERTSON, an individual, LAURA
VUJOVICH, an individual, ANNETTE
CONSALVOS, an individual, and JOYCE
FLYNN, an individual,

Plaintiffs,

v.

GYNECARE, INC. a California
Corporation; ETHICON, INC. a New
Jersey corporation, JOHNSON &
JOHNSON, a New Jersey corporation,
DOE MANUFACTURERS one through
one hundred,

Defendants.

Case No. 4:10-CV-04741-PJH

**STIPULATION AND JOINT REQUEST
FOR RELIEF FROM CASE
MANAGEMENT SCHEDULE AND
[PROPOSED] ORDER**

Date: April 7, 2011
Time: 2:00 p.m.
Courtroom: 3
Judge: Hon. Phyllis J. Hamilton

Complaint Filed: October 20, 2010
Trial Date: Not set

Pursuant to Local Rule 16-2(e) of the United States District Court of the Northern District
of California, the parties request a continuance of the Case Management Conference as follows:

1. On February 4, 2011, the Court scheduled a Case Management Conference for
April 7, 2011.

1 2. On March 1, 2011, Defendants moved to sever and transfer this action to each of
2 Plaintiffs' individual home districts. If Defendants' motion is granted, none of the Plaintiffs'
3 claims will remain in this Court. Defendants motion is scheduled to be heard on April 6, 2011.

4 3. All parties have agreed to request that the pending motion to sever and transfer be
5 decided before the parties move forward with this lawsuit.

6 WHEREFORE Plaintiffs and Defendants, hereby stipulate by the undersigned counsel to
7 request that the Court continue the Case Management Conference currently set for April 7, 2011
8 for an additional 90 days or to a date convenient to the Court.

9 Dated: March 15, 2011

DRINKER BIDDLE & REATH LLP

By: /s/ Michelle A. Childers

Michelle A. Childers

Attorneys for Defendants
ETHICON WOMEN'S HEALTH &
UROLOGY DIVISION OF ETHICON, INC.
(erroneously sued as GYNECARE, INC.);
ETHICON, INC.; and JOHNSON &
JOHNSON

16 Dated: March 15, 2011

GIRARDI & KEESE

By: /s/ Amanda Kent

Thomas V. Girardi
Amy Fisch Solomon
Amanda Kent

Attorneys for Plaintiffs

21 The Case Management Conference scheduled for April 7, 2011 is hereby continued until
22 July 7, 2011.

23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 Dated: 3/16/11

BY THE COURT

Honorable Phyllis J. Hamilton
United States District Court

